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August 29, 2024

Honorable Nusrat J. Choudhury
United States District Judge
100 Federal Plaza
Central Islip, NY 11722

Re: Re: Martinez Rivas v. Ariel Auto Collision Corp. et al., 23-cv-5371

Your Honor,

Plaintiff writes to formally respond to the pre-motion letter submitted by Defendants for motions under 12(b)(1) and 12(b)(6) of the FRCP.

While Plaintiff contends his pleadings are more than sufficient under existing case law, Plaintiff respectfully requests leave to file an Amended Complaint on or before September 6th, 2024 amplifying the Plaintiff's existing allegations in response to their pre-motion letter. There have been no prior amendments.

Respectfully Submitted,

/s/ Colin Mulholland, Esq.